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Doc. 231714

March 16, 2006

Via Hand Delivery

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

RECEIVED

MAR 16 2006

Federal Communications Commission
Office of Secretary

Re: VRS and IP Relay Service Application of GoAmerica, Inc.

Dear Ms. Dortch:

On behalf of GoAmerica, Inc. ("GoAmerica") and pursuant to the Commission's December 12, 2005 Order in Docket No. 03-123¹, attached for filing with the Commission is an original and two copies of GoAmerica's VRS and IP Relay Service Application.

Very truly yours,



Dana Frix
Counsel to GoAmerica, Inc.

cc: Ms. Monica Desai, Chief, Consumer and Governmental Affairs Bureau
Mr. Thomas Chandler, Chief, Disability Rights Office

¹ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Report and Order and Order on Reconsideration (rel. Dec. 12, 2005).

**Before The
Federal Communications Commission
Washington, D.C.**

In the Matter of)	
)	
Telecommunications Relay Services and)	
Speech-to-Speech Services for Individuals)	CG Docket No. 03-123
With Hearing and Speech Disabilities)	
)	
)	
VRS and IP Relay Certification Application)	

To: Chief, Consumer and Governmental Affairs Bureau,
VRS and IP Relay Certification Program

**Application by GoAmerica, Inc. for
Certification as a Video and IP Relay Services Provider**

Chadbourne & Parke, LLP
1200 New Hampshire Avenue
Suite 300
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March 16, 2006

**Before The
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With Hearing and Speech Disabilities)	
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VRS and IP Relay Certification Application)	

**Application by GoAmerica, Inc. for
Certification as a Video and IP Relay Services Provider**

GoAmerica, Inc. ("GoAmerica" or "Company"), by undersigned counsel and pursuant to the Commission's December 12, 2005 Order in this proceeding¹ and 47 C.F.R. §§ 64.604 and 64.605, hereby submits its application for certification as a Video and IP Relay Services provider.² As the services sought to be provided by GoAmerica

¹ *In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Report and Order and Order on Reconsideration (rel. Dec.12, 2005) ("*Certification Order*").

² By this application, the Company requests certification for all known Video and IP Relay services authorized by the Commission and all such services which are hereinafter approved by the Commission. Hereinafter, Video Relay Service shall be referred to as "VRS."

have been determined to be in the public interest, GoAmerica respectfully requests expeditious grant of this application.

I. Introduction

A. Introduction and Background on GoAmerica

Founded in 1996, GoAmerica is publicly traded on the NASDAQ capital market system. Its website is www.goamerica.com. Its Securities Exchange Commission filings can be accessed via this site. A link to GoAmerica's annual report is appended hereto as Attachment 1. Biographical descriptions of GoAmerica's executive management are appended hereto as Attachment 2.

GoAmerica provides a range of wireless, relay and prepaid communications services, customized for people who are deaf, hard of hearing or speech-disabled. Additional products carried by the Company include wireless devices, value-added subscription services for wireless products, and prepaid communications services. Given its historical focus on the deaf, hard of hearing and speech-disabled markets (collectively, the "Deaf and Hard of Hearing Market"), and the fact that GoAmerica currently provides common carrier telecommunications services, certification of GoAmerica to provide VRS and IP Relay services is both in the public interest and consistent with the Commission's rules.

Historically GoAmerica has sought to serve the Deaf and Hard of Hearing Market by providing innovative service offerings and providing consumer outreach and support. By this application GoAmerica seeks to extend its service offerings by providing directly

to its end-users the VRS and IP Relay services contemplated by the *Certification Order*. Grant of this application can be expected to enhance competition in the provision of VRS and IP Relay, thereby providing consumers greater choice. Additional competition will, in turn, stimulate new and improved services while at the same time promoting broadband deployment. *See Certification Order* at para. 21.

By way of introduction, GoAmerica understands its obligation to provide VRS and IP Relay services pursuant to the rules and regulations ("Rules") of the Commission, both those currently in existence and those which may be established in the future. GoAmerica agrees to comply with all such Rules as they may exist from time to time. As required by the Commission's rules³, this application provides the following information:

- (i) A description of the forms of TRS to be provided (*e.g.*, VRS and/or IP Relay);
- (ii) A description of how GoAmerica will meet all non-waived mandatory minimum standards applicable to each form of TRS offered;
- (iii) A description of GoAmerica's procedures for ensuring compliance with all applicable TRS rules;
- (iv) A description of GoAmerica's complaint procedures;
- (v) A narrative describing any areas in which GoAmerica's service will differ from the applicable mandatory minimum standards;

³ *See Certification Order* at para. 22 and 47 C.F.R. § 64.605(a)(2).

- (vi) A narrative establishing that services that differ from the mandatory minimum standards do not violate applicable mandatory minimum standards;
- (vii) Demonstration of GoAmerica's status as a common carrier; and
- (viii) A statement that GoAmerica will file annual compliance reports demonstrating continued compliance with these rules.

B. Grant of this Application is in the Public Interest

This application should be granted because, as specified in this application: (1) the provision of VRS and IP Relay services by GoAmerica will meet or exceed all non-waived operational, technical, and functional minimum standards contained in the Commission's rules, (2) GoAmerica will make available adequate procedures and remedies for ensuring ongoing compliance with the Commission's rules, including making available informational materials on complaint procedures sufficient for VRS and IP Relay end-users to know the proper procedures of filing complaints; and (3) GoAmerica's VRS and IP Related services will not differ from the mandatory minimum standards. *See Certification Order* at para 23 and Section 64.605(b)(2) of the Commission's rules.

II. Narrative Description of Required Information

A. Description of Services

By this application GoAmerica seeks certification to provide VRS and IP Relay services.

B. Description of GoAmerica's Ability to Meet All Non-Waived Mandatory Minimum Standards

GoAmerica currently offers an IP Relay service to consumers as a marketing and technology subcontractor to Nordia, Inc. a California-certificated TRS provider. Appended hereto as Attachment 3 is a description of the mandatory minimum standards applicable to VRS and IP Relay services and a description of GoAmerica's ability and willingness to meet all non-waived mandatory minimum standards. Pending certification from the Commission, GoAmerica will continue its partnership with Nordia, with Nordia serving as an operational subcontractor to GoAmerica. This would not preclude GoAmerica from providing its own Communications Assistants in its own call centers while continuing to comply with the appropriate rules for Internet-based relay services.

C. Description of GoAmerica's Procedures for Ensuring Compliance with VRS and IP Relay Service Rules

As noted, GoAmerica currently utilizes Nordia, a state-certificated TRS provider, in making IP Relay services available to end-users. This relationship, which requires by contract that Nordia comply with all federal and state TRS regulations, will continue for the foreseeable future. If GoAmerica decides to establish its own call centers and to staff these call centers with its own CAs, GoAmerica will establish a TRS "Compliance Officer." The Compliance Officer will be tasked with developing and establishing compliance procedures that ensure that GoAmerica and its Communications Assistants adhere to all of the Commission's rules, including those that specifically define the manner in which the Communications Assistants serve end-users. As noted above, a

description of the Commission's rules applicable to VRS and IP Relay services, is appended hereto at Attachment 3.

D. Description of GoAmerica's Complaint Procedures

GoAmerica will offer customer service through an online form made available on its web portal. Submissions will be received by customer service specialists, who will then work with each complainant towards resolution. Complaints seem likely to fall into one of two categories: a) technical issues, such as not being able to use certain features on its web portal or through its service applications or networks, or b) CA performance issues, such as failing to follow end-user instructions, and errors in typing or interpretation. GoAmerica will make available a variety of support resources online, such as Frequently Asked Questions, to address those end-users looking for immediate answers. Complaints will be responded to promptly, and escalated as needed until resolved. GoAmerica agrees to maintain a log of consumer complaints. It will contain a list of all consumer complaints, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. By July 1 of each year, GoAmerica will submit to the Commission summaries of logs indicating the number of complaints received for the 12-month period ending May 31.

E. Areas in Which GoAmerica's Services Will Differ from the Mandatory Minimum Standards Prescribed by the Commission

GoAmerica's services will not differ from the mandatory minimum standards the Commission has established. In the event that new or different standards are established, GoAmerica will either conform to those standards or apply to the Commission for a waiver of the particular standard.

F. Evidence That Services that Differ From Mandatory Minimum Standards Do Not Violate Applicable Mandatory Minimum Standards

Not applicable.

G. Demonstration of GoAmerica's Status as a Common Carrier

Appended hereto as Attachment 4 is evidence of GoAmerica's status as a Common Carrier.

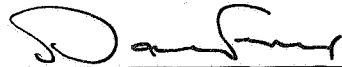
H. Statement that GoAmerica will File Annual Compliance Reports Demonstrating Continued Compliance with the Commission's Rules Governing VRS and IP Relay Services

GoAmerica acknowledges its obligation to, and agrees to, file annual compliance reports demonstrating its continued compliance with the Commission's rules governing VRS and IP Relay services, at a time and in a manner prescribed by the Commission. GoAmerica recognizes that currently such reports are due on April 16 of each year. *See 2004 TRS Omnibus Order* at para. 11 and Appendix E.

Conclusion

For the foregoing reasons GoAmerica respectfully requests expeditious grant of certification for its VRS and IP Relay services, thereby making GoAmerica eligible for cost reimbursement from the Interstate TRS Fund.

Respectfully submitted,



Dana Frix
Chadbourne & Parke, LLP
1200 New Hampshire Avenue
Suite 300
Washington, D.C. 20036
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March 16, 2006

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Attachment 1

Annual Report

GoAmerica's most recent annual report can be located online at the following URL:

<http://www.irconnect.com/mc/irc/secfilings.mc?cmd=disp&id=3576524&type=HTML>

Attachment 2

Description of Management

Dan Luis – Chief Executive Officer

As the CEO of GoAmerica, Inc., Dan Luis is focused on providing the vision and strategy for the company. Dan was named CEO in January 2003 and has since led GoAmerica through a strategic refocusing process accompanied by new financing. From May 2002 through his appointment as CEO, Dan was GoAmerica's president and chief operating officer.

Dan first joined GoAmerica in 2000 through the acquisition of Wynd Communications by GoAmerica. After helping launch Wynd in 1994 as its vice president of business development, Dan became Wynd's president and CEO in 1998. During his tenure, he successfully refocused Wynd's operations, developed a new strategy for the company and raised new financing.

A respected communications executive, Dan brings 15 years of industry experience to GoAmerica through sales, marketing and management positions at Wynd, Contel (now Verizon), an Incumbent Local Exchange Carrier (ILEC), and CallAmerica, a value-added Competitive Local Exchange Carrier (CLEC). Luis has a Bachelor of Science degree and Master of Business Administration degree from California Polytechnic State University.

Donald Barnhart – Chief Financial Officer

Donald Barnhart serves as GoAmerica's Chief Financial Officer, responsible for the company's financial, human resources and other administrative departments. Donald joined GoAmerica in 1999 and became its vice president and controller in 2000 until his appointment as Chief Financial Officer in March 2004. He brings 24 years of public and private accounting experience to his position, including 12 years of SEC reporting.

Prior to joining GoAmerica, he was with Bogen Communications and owned his own accounting and consulting firm. Donald is a CPA in New Jersey and is a graduate of Rutgers University.

Jesse Odom – Chief Technology Officer

Jesse Odom, a founding member of GoAmerica, developed Go.Web™, the company's first wireless offering. Since that time, Odom has served as CTO, responsible for overseeing the development of the company's wireless communications solutions and services. Jesse brings 14 years of networking and software development experience to his

position. Prior to joining GoAmerica, Jesse served at AIOC Corporation as Vice President of Network Engineering.

Wayne D. Smith – EVP and General Counsel

Wayne Smith joined GoAmerica in May 2002 as Vice President, General Counsel and was appointed corporate Secretary in November 2003. He was appointed Executive Vice President, General Counsel and Secretary in March 2005. Prior to joining GoAmerica, Mr. Smith held a variety of legal and staff positions with Viacom Inc. (a diversified entertainment company) from 1985 to 2001, most recently serving as Vice President, Corporate Counsel.

Joe Karp – Vice President, Marketing

As vice president of marketing, Joe Karp is responsible for leading GoAmerica's branding efforts, defining its marketing strategy, and driving the company's marketing initiatives. Joe oversees advertising, community events and outreach, and public relations as well as partner marketing and strategic alliances. A seasoned executive, Joe brings 15 years of consumer and business marketing experience in the communications and technology arenas with companies such as Ziatech (now Performance Technologies), CallAmerica and Wynd Communications. He has been instrumental in building the company's wireless and relay brands in the deaf and hard of hearing market. A graduate of California Polytechnic State University, Joe holds a degree in Business Administration.

Mark Stern - Vice President, Product Management

Mark Stern is responsible for the product management of GoAmerica's products and services that are designed to meet consumer needs for accessible communications and ease of use. In doing so, he collaborates closely with the development and marketing teams. Mark brings over 20 years experience in product development, ranging from high-end scientific applications to web-based consumer products and has held design and management positions at Netscape, America Online, and Apple Computer. Stern holds a master's degree in Computer Science from Brown University and a bachelor of science degree from Stanford University in Values, Technology, and Society. Stern is an active member of the Alexander Graham Bell Association for the Deaf and Hard of Hearing, the National Association of the Deaf, and the Deaf Pilots Association.

Attachment 3

Description of Mandatory Minimum Service Obligations And GoAmerica's Commitment to Meet Such Obligations

Communications Assistant Issues

GoAmerica believes that the competency of its CAs is among the most critical components of serving the Deaf and Hard of Hearing Market and GoAmerica is committed to establishing rigorous proficiency standards for its CAs.

Competency Qualifications. Sections 64.604(a)(1)(i-iv) of the Commission's rules require that all Communications Assistant ("CAs") be sufficiently trained to meet the needs of people who are deaf, hard of hearing, or speech-disabled; that they have competent typing, grammar, spelling and ASL skills, that they be familiar with deaf, hard of hearing, and speech-disabled cultures; that they possess clear and articulate voice communications; that they have a typing speed of at least 60 wpm; and that service providers such as GoAmerica test for such compliance with such typing competency. Importantly, service providers such as GoAmerica are responsible for ensuring that CAs in VRS settings are qualified interpreters, meaning that the CAs must be able to interpret effectively, accurately and impartially.

GoAmerica acknowledges these mandatory minimum obligations and agrees to comply with them. Initially, GoAmerica will comply with them by relying upon Nordia's CAs. Nordia has been certified by the state of California as meeting these requirements.

In the event that GoAmerica determines to staff CAs itself, as noted elsewhere in this application, GoAmerica will hire and train CAs that meet -- or exceed -- these minimum standards.

Staying with Calls. Sections 64.604(a)(v-vii) of the Commission's rules require that CAs answering and placing a TTY-based TRS or VRS call must stay with a call for a minimum of ten minutes, recognizing that TRS providers must make best efforts to accommodate a user's requested CA gender and that CAs shall transmit conversations in real time. GoAmerica shall ensure that its CAs operate in compliance with these standards.⁴

Confidentiality; Accuracy. Section 64.604(a)(2)(i) of the Commission's rules prohibit CAs from disclosing the contents of relayed conversations and, with limited exception, from keeping records of the content of calls, even where inconsistent with state or local law. Generally, CAs may retain information from a call only to facilitate the completion of consecutive calls. CAs are also prohibited from intentionally altering a relayed conversation and, except where illegal under other laws, must relay all

⁴ In its *2004 Omnibus TRS Order* (at paras. 248-249), the Commission has sought comment on whether the rule relating to CAs staying on the line for 10 minutes should be modified and also whether CAs should be allowed to ask questions of the calling party during the call set-up period.

conversations verbatim, unless requested otherwise. Appropriate measures must be taken to ensure such confidentiality. *See* Section 64.604(a)(2)(ii).

GoAmerica shall ensure, through initial training, supervision and subsequent training, that all CAs operating under its employ shall comply with these rules.

Types of Calls/Technology

Types of Calls. Sections 64.604(a)(3)(i-iii) of the Commission's rules prohibit CAs from refusing calls or limiting the length of calls. Providers such as GoAmerica shall be capable of handling all types of calls, except where credit authorization has been denied or those which the Commission has determined they need not accept. *Id.* The Commission has waived certain TRS rules for VRS and IP Relay service providers. Those waivers are discussed in Section 4 below.

GoAmerica will handle all types of calls normally provided by telecommunications carriers, such as local and long distance, except those which the Commission has found technologically infeasible and, thus, have been waived, and except those which the Commission does not reimburse.

Call Release Functionality; Speed Dialing, Three-Way Calling. The requirement under 64.604(a)(3)(vi) to provide these types of calls has been waived by the Commission. *See 2004 Omnibus TRS Order* at para. 111 and Exhibit E. At least initially GoAmerica will not provide these functionalities.

Voice Mail. Section 64.604(a)(3)(vii) of the Commission's rules require that TRS providers alert end-users to recorded messages via a "hot key" on the CA's terminal. Section 64.604(a)(3)(viii) of the Commission's rules require that providers provide answering machine and voice mail retrieval to end-users. GoAmerica will assist deaf, hard of hearing, or speech-disabled callers who wish to leave a voice mail message. GoAmerica will also alert users to the presence of recorded messages and interactive messages and assist them in responding to such messages.

Speed to Answer. Sections 64.604(b)(i) and (iii) of the Commission's rules require that VRS providers shall ensure adequate facilities and shall meet speed-of-answer requirements. For VRS calls, they are as follows: by January 1, 2006, providers must answer 80% of all calls within 180 seconds, on a monthly basis; by June 1, 2006, 80% of all calls must be answered within 150 seconds, on a monthly basis; and by January 1, 2007, 80% of all calls shall be answered within 120 seconds, on a monthly basis. For IP Relay calls, they are as follows: 85% of all calls shall be answered within 10 seconds, on a daily basis. The Company will comply with these requirements.

Equal Access to IXCs. Sections 64.604(b)(3) of the Commission's rules require that TRS users shall have access to their chosen interexchange carrier. This requirement has been waived for VRS and IP Relay service providers until January 1, 2008, provided that TRS providers provide free long distance service to end users. *See 2004 Omnibus TRS Order*, at para. 127. GoAmerica agrees to comply with this rule.

Twenty-Four Hour Operation. Section 64.604(b)(4) of the Commission's rules require that TRS providers operate twenty-four hours per day, every day, and that they have redundant features, including uninterruptible power for emergency use. GoAmerica agrees to comply with this rule.

Technology/Caller ID. Sections 64.604(b)(5) and (6) of the Commission's rules provide that TRS facilities that utilize SS7 shall be subject to CPTN rules, and that where a TRS facility is capable of transmitting any calling party identification information to the public telephone network, that it will do so by transmitting the number of the TRS facility, 711 or the 10 digit telephone number of the calling party. GoAmerica will comply with such rules, to the extent they are applicable. GoAmerica notes that SS7 is not applicable to VRS and IP Relay calls.

Information

Consumer Complaint Logs. Section 64.604(c) of the Commission's rules provides that a log of consumer complaints must be maintained. GoAmerica agrees to maintain such a log. It will contain a list of all consumer complaints, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. GoAmerica will submit summaries of logs indicating the number of complaints received for the 12 month period ending May 31 to the Commission by July 1 of each year.

Contact Persons. Section 64.604(c)(2) of the Commission's rules require TRS providers to submit to the commission contact information for an individual who will serve as the Commission's contact in the event issues arise. GoAmerica here provides such information. The GoAmerica contact person shall be:

GoAmerica Contact Person

Mr. Wayne D. Smith, Esq.
EVP and General Counsel
GoAmerica, Inc.
433 Hackensack Avenue
Hackensack, NJ 07601
Voice: 201-996-1717
Fax: 201-996-1772
TTY: 201-527-1520

Public Access to Information/Consumer Outreach. Section 64.604(c)(3) of the Commission's rules requires that TRS providers undertake education and outreach efforts to educate the public about TRS, including to members of the disability community and to the general public. Such efforts shall publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible. GoAmerica's business is designed to serve the TRS market, and therefore such "outreach" efforts is directly related to GoAmerica's success in the marketplace. Accordingly, GoAmerica will market its services consistent with this rule. Such outreach will include advertising, consumer trade show presentations, meetings with user communities, distribution of informational pamphlets, direct mailings to consumers, regular online communication, and other similar promotional activities.

Rates. Section 64.604(c)(4) of the Commission's rules impose certain rules regarding rates. By filing this application GoAmerica seeks to be compensated entirely through the Interstate TRS Fund, and therefore its services will be provided at no cost to GoAmerica's end-users. Each month, GoAmerica will report all of its Conversational Minutes of Use to NECA and NECA will reimburse GoAmerica based upon the rates established by the Commission.

Jurisdictional Separation of Costs. Section 64.604(c)(5) of the Commission's rules provide that, where appropriate, costs of providing TRS shall be in accordance with the Commission's jurisdictional separation of costs rules. Such rules do not apply to VRS and IP Relay services. *See Certification Order*,⁵ at para. 7 (noting that for VRS and IP Relay it is not possible to determine whether the call is jurisdictionally intrastate or interstate).

TRS Fund Administrative Issues. Section 64.604(c)(5)(iii) of the Commission's rules provide that (i) telecommunications carriers providing interstate telecommunications services shall contribute to the Interstate TRS Fund, (ii) that TRS providers shall provide the administrator with true and accurate information necessary to

⁵ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 0-123, Report and Order and Order on Reconsideration (rel. Dec. 12, 2005) ("*Certification Order*").

determine the fund's revenues requirements, (iii) that TRS providers shall comply with a variety of the TRS Fund rules, including rules designed to ensure that providers calculate monthly minutes of use accurately. GoAmerica agrees to comply with all such obligations.

Complaints. Section 64.604(c)(6) of the Commission's rules provide for the Commission's jurisdiction over consumer complaints and provides that the Commission shall treat such complaints as either "informal" or "formal" complaints. GoAmerica acknowledges the Commission's jurisdiction over such complaints and shall promptly satisfy or answer any complaint received by the Commission and forwarded to the GoAmerica.

Treatment of End-User Information. Section 64.604(c)(7) of the Commission's rules requires the confidential treatment of end-user profile data, and further provides that such data shall not be sold, distributed, shared or revealed in any way, unless compelled by lawful order. GoAmerica shall comply with this obligation.

Notification of Substantive Changes. Section 64.605(f)(2) of the Commission's Rules provides that all VRS and IP Relay providers shall notify the Commission of substantive changes in their TRS programs, services, and features within 60 days of such changes, and shall certify that it continues to meet federal minimum standards after implementation of such changes. GoAmerica agrees to comply with this obligation.

Annual Reports with the Commission. Section 64.605(g) of the Commission's rules provides that TRS providers shall file with the Commission Annual Reports

providing evidence that they are in compliance with Section 64.604 of the Commission's rules. GoAmerica shall comply with the obligation.

Communications Assistant Issues - VRS Waivers

The Commission has waived certain of its rules for VRS providers, provided that IP Relay and VRS providers file annual reports on April 16 of each year addressing the feasibility of meeting any of the waived TRS requirements.⁶ The waived rules include:

1. ***Pay Per Calls (900 Number).*** The FCC has waived until January 1, 2008 the requirement of 64.604(a)(3)(iv) that VRS providers be capable of handling pay-per-calls. *See 2004 Omnibus TRS Order* at para. 132.

2. ***VCO and HCO.*** The Commission has waived until January 1, 2008 the requirement of 64.604(a)(3)(v) that VRS providers be capable of handling VCO and HCO. *See 2004 Omnibus TRS Order* at para. 135.

3. ***Emergency Calls.*** The Commission has waived the emergency call handling requirements of 64.604(a)(4) until January 1, 2007⁷ or until the adoption of new rules.⁸

⁶ *2004 Omnibus TRS Order* at para. 140.

4. ***STS Called Numbers.*** The Commission has indefinitely waived for VRS and IP Relay service providers the requirements of 64.604(a)(5) that CAs maintain a list of the numbers STS users call. *See 2004 Omnibus TRS Order* at para. 139.

(Cont'd from preceding page)

⁷ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Report and Order and Order on Reconsideration, (Dec. 5, 2005) ("E911 Waiver Extension Order").

⁸ *In re Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Notice of Proposed Rulemaking, FCC 05-196 (rel. Nov. 30, 2005). The NPRM has not yet appeared in the Federal Register.

Attachment 4

Evidence of Common Carrier Status

GoAmerica, Inc.'s 499 Filer Identification Number is 825719 and is filed under GoAmerica Marketing, Inc (a wholly owned subsidiary of GoAmerica, Inc.) d/b/a GA Prepaid.